



The Fast Law Firm, P.C.

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June 5, 2023

Via ECF

Honorable Paul G. Gardephe
United States District Court Judge
Southern District of New York
500 Pearl St. Courthouse
New York, New York 10007

Re: United States v. Conrad Heron, 22 cr 514 (PGG)
Request of Modification of Pre-Trial Release Conditions

Dear Judge Gardephe:

I represent Conrad Heron on the above captioned matter. I am writing with the consent of Pre-trial Services to respectfully request a modification of Mr. Heron's Pre-Trial release conditions to remove curfew and electronic monitoring.

Mr. Heron's current pre-trial conditions include curfew with a radio frequency bracelet. The Defense is respectfully requesting that curfew and electronic monitoring be terminated for Mr. Heron. Since the inception of the case, he has resided in the District of New Jersey and has been in full compliance with the terms of his release conditions.

I have conferred with SDNY Pre-Trial Officer Ashley Cosme and she consents to this modification. DNJ Pre-Trial Officer Erika Dipalma who supervises Mr. Heron in DNJ defers to SDNY. AUSA Ashley Nicolas defers to Pre-Trial.

I am therefore respectfully requesting that Mr. Heron's be modified as outlined above. Thank you for your time and consideration for this request.

Respectfully Submitted,

s/ Elena Fast
Elena Fast, Esq.
Counsel for Conrad Heron

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe, U.S.D.J.

Date: June 6, 2023